



October 2, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, DC 20554

Re: Reply to Comments by Buckeye Hills Regional Council Regarding the Rural Digital Opportunity Fund WC Docket Nos. 19-126 and 10-90

Madam Secretary:

This letter is prepared in reply to comments submitted by the Buckeye Hills Regional Council on September 19, 2019, and reflects the position of Appalachian Partnership for Economic Growth (APEG) on the Rural Digital Opportunity Fund WC Docket Nos. 19-126 and 10-90.

APEG is a non-profit regional economic development organization. We serve 25 counties in southern and eastern Ohio – nearly 30% of Ohio's land mass – the hilly Appalachian region of Ohio that hugs the Ohio River from just east of Cincinnati to just south of Canton and Youngstown. Our rural region's population is about 1 million people, but broadband availability is the lowest in the state, which hurts our businesses, our work force, our economy and our children.

APEG's mission is to build enduring, widely-shared economic prosperity across Appalachian Ohio through growing regional businesses. Since our founding in 2011, we have helped over 150 company expansions or new locations. But the lack of broadband availability is a tremendous challenge.

In conjunction with our parent organization, the Appalachian Partnership, Inc., in early 2019 APEG completed a highly participatory regional prosperity planning process. That process involved over 450 people including 197 business leaders in one or more of 36 public-facing focus-groups and planning sessions. Addressing critical gaps in broadband access across the region was one of three issues identified in every public-input session for the planning process. Availability of skilled workforce and addressing gaps in availability of infrastructure to support business success were the other two issues, and broadband deployment is a critical constraint to both. Broadband is required for students to

prepare for 21st century workforce participation as well as for retraining displaced and incumbent workers. It is also essential infrastructure for the success of the region's businesses.

One outcome of the prosperity planning process was creation of a regional working-group to address the plan's strategies related to broadband deployment. Buckeye Hills Regional Council (BHRC) has assumed a co-leadership role with API and APEG for that group, and their research and analysis has been critical to the group's efforts. As a result of these efforts, we are intimately familiar with BHRC's comments on the referenced Dockets and the underlying research.

APEG supports and endorses the comments and recommendations made by BHRC. Please do not hesitate to contact me if you have questions about this endorsement.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mike Jacoby", is positioned above the printed name.

Mike Jacoby
President